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May 9, 2008

Reference No. 038443

Karen Cibulskis
Remedial Project Manager
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Mail Code SR-6J
Chicago, IL 60604

Dear Karen:

Re: Final Test Pit/Test Trench Investigation
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)

This Letter Work Plan presents the scope of work for a test pit and test trench investigation of parts of the Site. Conestoga-Rovers & Associates (CRA) has prepared this Letter Work Plan on behalf of the South Dayton Dump and Landfill Potentially Responsible Party Group (PRP Group).

This Letter Work Plan is based on the February 12 and 27, 2008 discussions between the PRP Group and United States Environmental Protection Agency (USEPA) regarding the additional data that the PRP Group would like to collect for the Feasibility Study (FS). The Letter Work Plan also incorporates comments from the USEPA on a draft that was discussed at the February 27, 2008 meeting. The Letter Work Plan incorporates comments received from USEPA on April 15, 2008.

The objectives of the test pit and test trench excavation and sampling are as follows:

- collect data to assist in identifying the nature and delineating the extent of various types of landfilled materials above the water table;
- collect data to assist in characterizing landfill materials above the water table;
- collect data to assist in characterizing leachate from unsaturated landfilled material;
- assess areas of the Site previously identified as specific areas of concern [i.e., Valley Asphalt drum removal area, Valley Asphalt former underground storage tank (UST) area (a.k.a. Dayton Recycling), Custom Delivery UST area, Lot 4423, etc.); and
- identify Site areas, which may require further investigation (for example leachate sampling and analysis, groundwater quality investigation, or other delineation work).





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The test pit and test trench investigations will be completed after the Land Survey, Bathymetry Survey, and Geophysical Investigation, and Leachate Seep Investigation have been completed. A schedule, including a Gantt chart, for the investigative activities to be completed at the Site in 2008 was provided to USEPA on March 11, 2008. The locations of the test pits and test trenches may be adjusted based on the results of these previously mentioned investigations and upon consultation with the USEPA.

TEST PITS/TEST TRENCHES

Test pits and test trenches are proposed in locations where the PRP Group would like to collect additional information about the depth and nature of the fill material above the water table. The information will be used to verify the limits of fill and to assist in characterizing the nature of the landfilled materials present in the areas investigated.

Six test pits will be excavated in the central portion of the Site. Twenty-three test trenches will be excavated throughout the Site.

The locations of the test pits and test trenches will be finalized based on the results of the geophysical investigation (the USEPA may be asked to approve moving, relocating, or adding test pit and test trench locations based on field observations, geophysical investigation results, etc.). The nature and depth of fill material above the water table will be visually identified and recorded. Test trenching will focus on the perimeter of the PRP Group's preliminary direct contact presumptive remedy area, which was defined in the Remedial Investigation/Feasibility Study (RI/FS) Statement of Work (SOW) and the area immediately beyond the perimeter. In addition, the test trenching will assist in identifying and characterizing fill material at locations along the western embankment of the Site. Excavations will be completed to the depth of the water table, where possible (as limited by the ability of the excavator to reach the depth of the water table, the stability of the walls of the excavation, and/or the presence of obstructions). If an obstruction is encountered during the excavation of a test trench, the location of the trench will be adjusted to avoid the obstruction. If excavation to the water table is not possible due to the depth of the water table or the stability of the fill material, the PRP Group will consider the need for additional investigation at the location in question during future investigation work. The potential impacts from saturated fill materials will be assessed as part of the groundwater investigation proposed for the Site (under separate cover). The utility of this information to the FS is discussed above.

Test pits and test trenches will be excavated in the locations shown on Figure 1. As noted above, the locations of the test pits and test trenches may be adjusted based on the results of the



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Land Survey, Bathymetry Survey, and Geophysical Investigation, and the Leachate Seep Investigation and upon consultation with the USEPA. Each test pit will be approximately 6 feet long by 3 feet wide and will extend to the water table, if the excavation can be completed safely to that depth (i.e., stable slopes and excavation sidewalls, no buried structures, etc.) and the excavator is capable of reaching that depth.

Each test trench will be approximately 30 feet long by 3 feet wide, and will extend to the water table (if this can be excavated safely) and horizontally to the visual limit of fill. If the horizontal limit of fill is not determined in any planned 30-foot trench, to the extent practical (i.e., where not impeded by the presence of surface structures, property boundaries, unstable slopes or side walls, buried structures, etc.), the test trench lengths will be extended to attempt to visually locate the edge of the fill. This visual limit (both lateral and vertical) will be determined by the presence of undisturbed native soil in the excavation. CRA will also note if fill material appears to consist of re-located spoils from the gravel extraction operation versus undisturbed native material; however, the presence of relocated spoils will not be used as an indicator that other wastes have not been disposed at an individual location. Test trench excavation will continue in these areas to the depth of native material or the maximum reach of the excavator, whichever is less.

The nature and depth of fill material will be visually identified and recorded. The procedures and equipment to be used to excavate trenches and visually characterize the fill material are described below.

TEST PIT AND TEST TRENCH EXCAVATION PROCEDURES

An excavator or extended reach backhoe will be used to excavate the test pits and test trenches. The reach of the excavator or backhoe will be at least 18 feet. Data regarding conditions at depths greater than those that can be reached by the excavator may be obtained during vertical aquifer sampling and monitoring well installation. The PRP Group will provide the details of any soil sampling during VAS and any revisions to the Field Sampling Plan and Quality Assurance Project Plan to EPA for review and approval prior to conducting this work. The PRP Group will also submit any revisions to the Health and Safety Plan (HASP) to EPA for review prior to conducting this work.

The test pit excavation procedures are as follows:

1. Each test pit will be assigned a unique identification number. Prior to starting the test pit excavations, the locations of each test pit and test trench will be staked in the field



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using the locations identified on Figure 1. As noted above, the locations of the test pits may be adjusted based on the results of the Land Survey, Bathymetry Survey, and Geophysical Investigation, and the Leachate Seep Investigation and upon consultation with the USEPA;

2. The area immediately adjacent to the test pit will be covered with two layers of 6-mil polyethylene sheeting for stockpiling excavated fill material. The polyethylene sheeting and excavation spoils will be placed downwind of field personnel and in such a manner that water runoff from the fill material will be directed back into the excavation. If possible, fill material temporarily stockpiled on the liners will be backfilled into the open excavations before the contractor leaves the Site for the day. If the fill material cannot be backfilled at the end of the workday, the contractor will ensure the material is covered securely with a polyethylene liner to control potential emissions and to minimize the exposure of the material to rainwater. The contractor will also ensure that temporary fencing is placed around the stockpiled material and the open excavation;
3. The test pits will be approximately 3 feet wide and will extend to the depth of the water table, where possible and feasible (as limited by the ability of the excavator to reach that depth, the stability of the walls of the excavation, and/or the presence of obstructions). The lengths of individual test pits will be determined in the field by the field representative based on conditions encountered during excavation. If obstructions are encountered and sidewalls are stable, then the width or length of the test pit may be expanded to aid in excavating to depth. Excavation at each location will be completed in a controlled manner so as to minimize damage to any potentially intact drums. If a test pit cannot be excavated to the surface of the water table due to obstructions or sidewall instability, and the excavation equipment is capable of reaching that depth, the test pit will be relocated 50 feet (or a lesser distance if appropriate) from the original location and attempted again. If, during the excavation of a test pit, PID, particulate, or vinyl chloride readings above the action levels in the HASP are recorded, excavation of the test pit will cease and the Site Supervisor (SS) will evaluate what actions (i.e., upgrade in level of personal protection equipment or termination and backfilling of test pit) are appropriate. If during the excavation of a test pit, combustible gas, oxygen, hydrogen sulfide, carbon monoxide, or radiation readings exceed (or in the case of oxygen fall below) an action level, the test pit excavation will be immediately stopped and the test pit backfilled, provided it is safe to do so. The test pit will be relocated 50 feet (or a lesser distance if appropriate) from the original location and attempted again. The location will be documented, and, if appropriate and safe to do so, may be investigated further during other investigative activities at the Site (i.e., Groundwater Investigation, Landfill Gas/Soil Vapor Investigation, etc.);



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4. CRA will observe the materials excavated and record the nature of the materials on a test pit stratigraphy log. The test pits will be excavated in two to three foot increments to aid in accurately determining the depth of discrete layers of fill material and the fill material/native material interface. Where appropriate, and where it is safe to do so, CRA will measure the depth of the test pit excavation where specific layers of fill material are encountered and the total depth of the excavation. The observations will include a visual description of the types of material (i.e., undisturbed native soil, spoil from quarry operations, domestic refuse, industrial refuse, metallic debris, ash, fly ash, construction and demolition debris, foundry sand, asphalt, slag, or other appropriate description) and, if possible, a Unified Soil Classification System (USCS) description. Soils will be logged using the USCS by an on-Site geologist. Soil classification methods will include visual assessment, texture assessment, dry strength tests, toughness tests, and dilatancy tests, as appropriate depending on the nature of the soil encountered. The visual classification of waste materials is, by its very nature, somewhat arbitrary. The on-Site geologist will be experienced in performing such observations, which will be based on the physical nature of the material encountered. As detailed below, samples of distinct fill materials will be retained in the event that the classification of specific materials needs to be revisited in future. Photographs of the material will also be included;
5. Empty drum overpacks will be maintained at the Site during excavation. Should an intact waste container be damaged during excavation the drum management procedures presented in Attachment A will be implemented; and
6. Each test pit will be backfilled with the excavated materials in reverse order to that in which they were removed. The test pits will be restored to match surface conditions prior to excavation. During backfilling of the test pit, the bucket of the excavator will be used to compact the material as it is placed in the excavation in order to ensure that any expansion of the materials that occurs during excavation is reversed and the test pits can be restored to grade.

Access of the general public and on-Site commercial/industrial workers to the investigative locations will be restricted by the SS and air monitoring will be used to ensure that any emissions generated during test pitting activities do not pose a risk to the general public or on-Site workers. On-Site commercial/industrial workers will be notified in advance of intrusive activities that may have the potential to generate emissions, where these intrusive activities are located proximally to an active on-Site commercial/industrial facility.



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Test trenches will be excavated in the same manner as detailed above for test pits except that test trenches will be excavated to the top of the water table in a continuous length of approximately 30 feet or the horizontal limit of fill (if undisturbed native soil is encountered before reaching 30 feet) as discussed above.

To the extent possible given the available data for the Site, CRA will attempt to start the excavation in areas of fill (i.e., non-native) material and continue the excavation towards the presumed location of native material. If fill is encountered at the start of the trench, the trench will be excavated in the presumed direction of native material, e.g., away from the PRP Group's direct contact presumptive remedy area. If native material is encountered at the start of the trench, the trench will be excavated in the presumed direction of fill material, e.g., towards the PRP Group's direct contact presumptive remedy area. As noted above, if the horizontal limit of fill is not determined in any planned 30-foot trench, to the extent practical (i.e., where not impeded by the presence of surface structures, property boundaries, unstable slopes or side walls, buried structures, etc.), the test trench lengths will be extended to attempt to visually locate the edge of the fill. Where further extension of a test trench is not feasible and/or practicable, the PRP Group may, in consultation with the USEPA Site representative(s), elect to abandon a test trench location and install an additional test trench off-set from the original location in the presumed direction of the native/fill material, as appropriate. As noted above, the locations of the test trenches may be adjusted based on the results of the Land Survey, Bathymetry Survey, and Geophysical Investigation, and the Leachate Seep Investigation and upon consultation with the USEPA.

If clean backfill material is encountered during any of the test trenches proposed in the Valley Asphalt drum removal area, the Dayton Recycling UST removal area, or the Custom Deliveries UST removal area, CRA will attempt to continue the test trench excavation away from the location of the clean backfill material or relocate the test trench outside the clean backfill material, as appropriate depending on the size of the original excavation.

The test trenches will be used to visually determine the limits of the fill and to provide information on the nature of the fill material at these locations.



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TEST PIT AND TEST TRENCH SAMPLING

The following sampling procedures and associated tasks will be performed as part of the Test Pit/Test Trench Investigation:

1. CRA will prepare a photographic log of each test pit excavation during its progression. The photographic record will list the date of each photograph, a specific description of what the photograph depicts, its location, and the photographer;
2. The dimensions of each excavation and a description of the materials encountered during excavation will be recorded on a Test Pit Stratigraphy log, an example of which is contained in Attachment B;
3. Samples of the fill will be collected, from each sidewall and the base of the excavation during the excavation. A minimum of one sample collected from each test pit and two samples collected from each test trench will be submitted to an analytical laboratory for analyses. The specific material selected for sampling and the number of samples will be determined in the field by the CRA field representative and reviewed with the USEPA Site representative(s). Sample selection will be based on the visual appearance of the material (for example, color, staining, grain size, etc.), location of the material prior to removal (for example, adjacent to drums or base of excavation), and field instrument measurements [i.e., headspace readings using a photo-ionization detector (PID)]. CRA will collect a sample of each visually distinct layer of fill type for headspace analysis. Where fill material encountered is not visually distinct with depth, CRA will use visual and olfactory evidence of contamination and PID screening of the soil as it is excavated to identify appropriate samples for headspace screening. All olfactory evidence will be obtained taking care to limit exposure to any vapors and in accordance with the HASP. At a minimum, if fill material is not visually distinct with depth, samples will be collected for headspace screening approximately every five feet vertically. The headspace analysis will aid in the selection of the discrete samples to be analyzed from each excavation and in the selection of the sample(s) to be retained from each distinct fill type based on visual observations and headspace analysis (see below). The observations will be recorded in the Test Pit Stratigraphy log. The samples will be collected directly from the bucket of the excavator and/or the stockpiled spoils. The sample collection procedures are identified in the Field Sampling Plan. Fill material samples will be collected in an attempt to characterize distinct fill zones or landfilled materials based on visual observations, PID readings, and the analytical data generated from the program as discussed below. CRA will also use representative fill samples retained (see below) from each test pit and test trench to compare fill types from different excavations. Samples of the same distinct fill zones or landfilled materials



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based on visual observations and headspace analysis will be collected from multiple test pit and test trenches where possible, i.e., where the same distinct fill zone or landfilled materials based on visual observations and headspace analysis are present in more than one test pit in recoverable quantities;

4. A portion of each sample will be placed in a separate container for headspace analysis using a PID. Results of the headspace analysis will be recorded in the Test Pit Stratigraphy log. A sample from each distinct fill type observed in each test pit and test trench will be retained in appropriate sampling containers maintained at appropriate temperatures so that samples may be submitted in the future (within the applicable sample holding time) for laboratory analysis. Field observations and field screening results will be reviewed with the USEPA's Site representative(s) on a daily basis;
5. Daily proposed sample submissions to the analytical laboratory will be reviewed with the USEPA's Site representative(s). At a minimum, samples of each distinct fill type (based on visual observations and headspace analysis) encountered at the Site will be submitted for the following analyses: Target Compound List (TCL) volatile organic compounds (VOCs), TCL semi-volatile organic compounds (SVOCs), TCL herbicides and pesticides, TCL polychlorinated biphenyls (PCBs), and Target Analyte List (TAL) inorganics. Where field observations and field screening indicate that similar types of fill material in different test pits/test trenches may be from different sources (e.g., visually similar materials in two distinct and separate layers within a trench or at widely varying depths within adjacent trenches, or visually similar materials in different trenches in different areas of the Site), additional samples may be submitted. Additional samples may also be submitted where visually similar fill materials are potentially impacted by different contaminants (e.g. visually similar materials where one has a strong odor and the other a high organic vapor content as measured using a PID).

Multiple samples of similar fill types based on visual observations and headspace readings encountered across the Site will be submitted for TCL/TAL laboratory analysis to assess the variability of the analyzed materials within the Site. Ash fill materials encountered will be collected and submitted for dioxin and furan analyses. Up to 10 samples of ash will be submitted for dioxin and furan analyses if ash is encountered in at least 10 separate excavations. If potential friable asbestos-containing materials (ACM) (i.e., ceiling tiles, wall board, pipe insulation, automotive brake pad manufacturing refuse, etc.) are encountered, a minimum of one sample of each distinct type of potential ACM will be submitted for asbestos analysis. A sampling summary is presented in Table 1. The HASP includes provisions to assess worker exposure to potentially radioactive foundry sands.



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6. Should leachate seeps be identified in any of the test pits or test trenches, samples will be collected. For shallow leachate seeps that can be reached by hand from the edge of the test pit or trench, the area located immediately beneath the seep will be dug out using a clean shovel or trowel. A clean sample jar or pail will be set into the dug out area and the liquid will be allowed to gently accumulate in the container. If the depth of the excavation prohibits field personnel from safely conducting the liquid collection, sufficient saturated material in and around the seep will be excavated and placed on a polyethylene sheet and the liquid allowed to gently drain into a container. A field blank sample of distilled deionized water poured onto clean polyethylene sheeting will also be collected. The liquid will be transferred to sample containers for submission to the analytical laboratory. As the volume of liquid may be limited, prioritization of requested analyses for the sample will be as follows: TCL VOCs, TCL SVOCs, TCL herbicides and pesticides, TCL PCBs, and TAL inorganics. A sampling summary is presented in Table 1. Sampling of leachate seeps identified during the Test Pit/Test Trench Investigation will be performed in accordance with the Leachate Seep Investigation Work Plan and the Field Sampling Plan (FSP);
7. A composite sample of each fill type (i.e., construction and demolition debris, ash, and cinders, etc.) will be prepared from the retained samples of the fill types from the test pits and test trenches and submitted to the analytical laboratory for Toxicity Characteristic Leaching Procedure (TCLP) preparation with subsequent analysis of the resultant leachate for VOCs, SVOCs, herbicides, pesticides, and metals. Samples will also be analyzed for PCBs, corrosivity, ignitability, and reactive cyanide and sulfide. A minimum of one composite sample will be submitted for each fill type. Where similar fill types are present in widely separated locations, additional samples may be submitted. The parameters and associated analytical methods are specified in Table 1; and
8. Duplicate photographs and the corresponding photographic record will be provided to USEPA and the Ohio Environmental Protection Agency (Ohio EPA) at the completion of this investigation.

The following protocol will be used to determine the number of samples to be submitted for laboratory analysis. Specific samples to be submitted for laboratory chemical analysis will be selected by the CRA field representative and reviewed with the USEPA's Site representative(s) on a daily basis. Depending on the nature of materials encountered in an individual test pit or trench, the number of samples for each medium may vary. For example, if no drums or only minimal amounts of drum remnants are observed in a test pit, samples of drum contents would not be collected. In addition, the number of samples submitted for laboratory chemical analysis



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may increase or decrease depending on headspace results, field observations, the spatial distribution and types of existing data, and the number and types of samples collected.

The intent of the test pit and test trench investigation is to identify locations that exhibit similar characteristics (i.e., visual, physical, and, to the extent the materials are analyzed, chemical composition). Test pits may be grouped together based on similar field observations. Where grouping occurs, CRA will select samples from the entire grouping for chemical analysis. The CRA field representative will establish the groupings, identify which test pits and test trenches will compose a given grouping, and select fill samples for submission to the analytical laboratory for analysis. Fill materials will only be grouped together where the fill materials are present in the same area of the Site and where laboratory holding times allow. Inherent in the grouping of fill types is the presumption that analytical data and other results obtained will be representative of the entire grouping. CRA will attempt to evaluate this presumption through replicate sampling in wide spread waste types at a frequency of one replicate sample for every five grouped samples. The test pit and test trench locations that are grouped together along with the corresponding sample identification number(s) will be identified in the Test Pit Stratigraphy log. Sample selection will be performed such that fill types from multiple different locations are selected.

All work will be performed in accordance with the FSP, Quality Assurance Project Plan (QAPP), and HASP pending USEPA's approval of the relevant sections of these documents.

SCHEDULE

The test pit and test trench investigation work will commence within two weeks of the submission of the Survey and Geophysical Survey Report to the USEPA. Field activities will be completed within three weeks. CRA plans to use a single excavator to complete the test pit/test trenching activities; however, a second excavator and field crew will be added if scheduling constraints so dictate. The PRP Group will provide the USEPA with verbal notification of field activities and the number of excavators to be used at least 15 days in advance of the initiation of field activities.

REPORTING

Results of the test pit and test trench investigation will be summarized and presented in a report. The report, which will include a description of the field work completed, any deviations from this Letter Work Plan and the rationale behind the change, photographs, logs, analytical



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summary tables, and analytical data reports, will be provided to the USEPA and Ohio EPA within one month of the receipt of analytical data from the laboratory. Monthly progress reports during the Test Pit/Test Trench Investigation fieldwork will include the information required for monthly progress reports in the RI/FS SOW (including test pit/test trench locations, headspace readings, visual fill descriptions, stratigraphic information, samples collected, and analytical data).

Should you have any questions on the above, please do not hesitate to contact us.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

Stephen M. Quigley

AL/ca/23

Encl.

c.c. Matt Mankowski, USEPA (PDF)
Matt Justice, Ohio EPA (PDF)
Eric Kroger, CH2M Hill (PDF)
Scott Blackhurst, Kelsey Hayes Company (PDF)
Wray Blattner, Thompson Hine (PDF)
Ken Brown, ITW (PDF)
Jim Campbell, Engineering Management Inc. (PDF)
Tim Hoffman, Representing Kathryn Boesch and Margaret Grillot (PDF)
Paul Jack, Castle Bay (PDF)
Robin Lunn, Mayer Brown (PDF)
Roger McCready, NCR (PDF)
Karen Mignone, Pepe & Hazard (PDF)
Adam Loney, CRA (PDF)

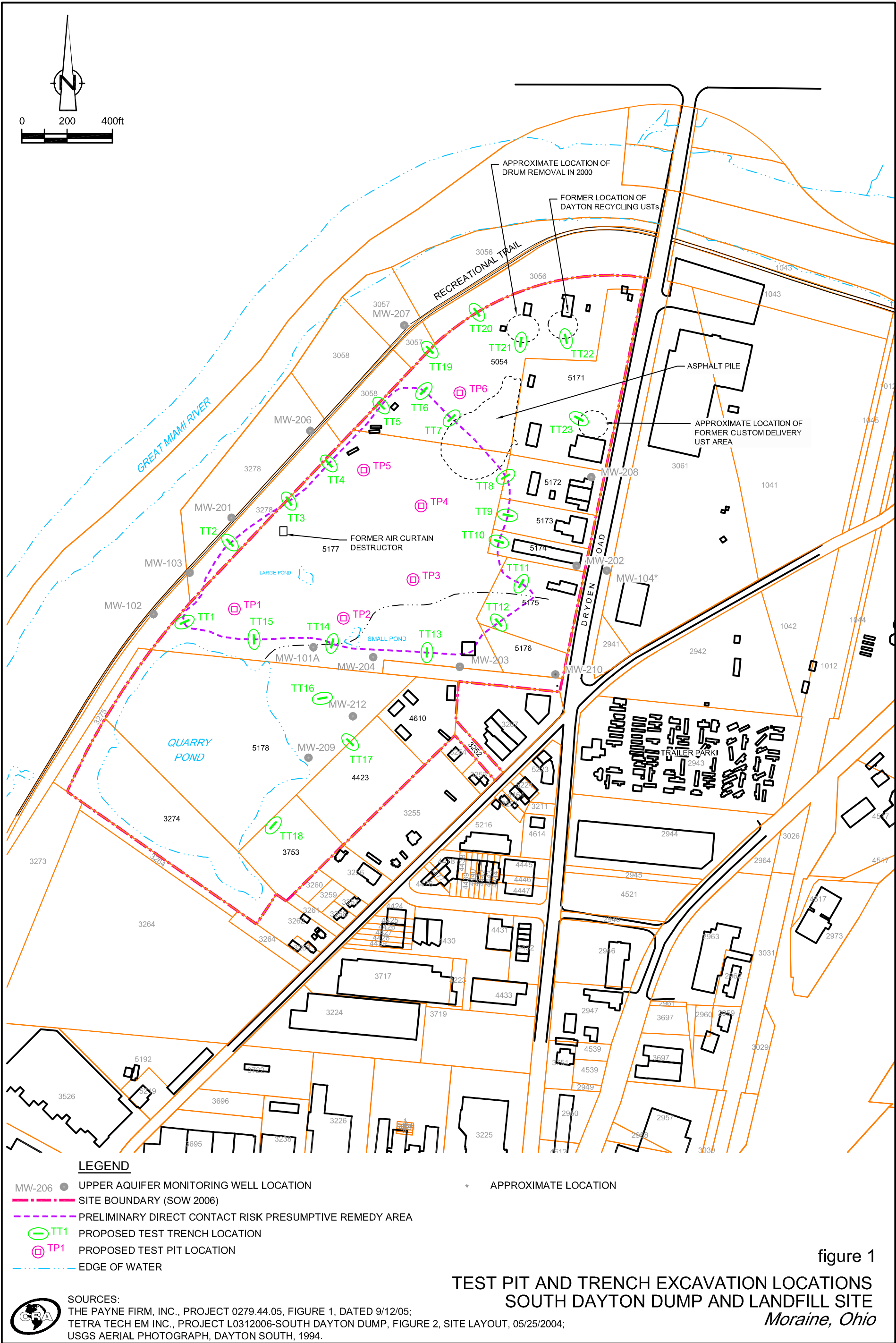


TABLE 1

**SUMMARY OF TEST PIT/TEST TRENCH SAMPLING AND ANALYSIS PROGRAM
SOUTH DAYTON DUMP AND LANDFILL
MORaine, OHIO**

Task/Event	Sample Matrix	Field Parameters	Laboratory Parameters	Sample Locations	Investigative Samples ⁵	Quality Control Samples ¹			Total ³
						Field Blanks ²	Field Duplicates	MS/MSD LCS/LCD	
Test Pit Sampling	Solid	PID Screen / Visual Observation of Distinct Fill Types/Intervals	TCL VOCs, TCL SVOCs, TAL Inorganics ⁴ , TCL Herbicides and Pesticides, TCL PCBs, TCLP ⁶	6	6	1	1	1	9
Test Trench Sampling	Solid	PID Screen / Visual Observation of Distinct Fill Types/Intervals	TCL VOCs, TCL SVOCs, TAL Inorganics TCL Herbicides and Pesticides, TCL PCBs, TCLP ⁶	23	46	5	3	3	57
Ash Fill Materials	Solid	Visual	Dioxins & Furans	TBD	TBD	TBD	TBD	TBD	TBD
Potential Asbestos Containing Materials	Solid	Visual	Asbestos	TBD	TBD	TBD	TBD	TBD	TBD
Leachate Sampling	Liquid	PID Screen	TCL VOCs, TCL SVOCs, TCL Herbicides and Pesticides, TCL PCBs, TAL Inorganics	TBD	TBD	TBD	TBD	TBD	TBD
Waste and/or Drum Characterization	Solid/Water	PID Screen	TCLP VOCs, TCLP SVOCs, TCLP Herbicides, TCLP Pesticides, TCLP Metals, PCBs, Corrosivity, Ignitibility, Reactive Cyanide, Reactive Sulfide	TBD	TBD	--	--	--	TBD

Notes:

- 1 Quality control samples will include laboratory supplied trip blank samples for volatile sample analysis with each shipping cooler of aqueous investigative samples.
- 2 Field blank samples consisting of equipment rinsate blanks will not be collected when dedicated or disposable sampling equipment is employed.
- 3 The total quantity is dependent on the actual quantity of samples and field quality control samples collected.
- 4 TAL Inorganics include the 23 metals and total cyanide.
- 5 Refers to the minimum number of investigative samples to be collected.
- 6 TCLP analysis will be completed on selected composite samples for the parameters listed under Waste and/or Drum Characterization as per the Letter Work Plan.

TCL - Target Compound List
VOC - Volatile Organic Compounds
SVOC - Semi-volatile Organic Compounds

TAL - Target Analyte List
PCB - Polychlorinated Biphenyls
TCLP - Toxic Characteristics Leachate Procedure

DO - Dissolve Oxygen
ORP - Oxygen Reduction Potential

ATTACHMENT A

DRUM MANAGEMENT PROCEDURES

ATTACHMENT A

DRUM MANAGEMENT PROCEDURES

The following presents the procedures associated with drum identification, management and sampling:

- Markings on any drums or other waste containers encountered will be examined, documented, and photographed and keyed to a unique drum identification number;
- The contents of a representative number of drums or other waste containers encountered will be sampled. The containers to be sampled will be selected by the field representative. Samples will be collected in or near test pits from containers that are ruptured and whose contents are readily accessible. Samples from undamaged drums will be collected from the drum following placement in the overpack. Liquid samples will be analyzed for the parameters and using the methods specified in Table 1; and
- Empty drum overpacks will be maintained at the Site during excavation. Should an intact waste container be damaged during excavation, it will be immediately removed from the excavation and placed in an overpack. Any material that becomes visibly impacted by a release from a damaged waste container will also be removed from the excavation and placed on a separate sheet of polyethylene adjacent to the test pit. All overpack drums and excavated visibly impacted material will be handled in accordance with the procedures detailed in the Field Sampling Plan for handling investigation-derived wastes.

ATTACHMENT B

TEST PIT STRATIGRAPHY LOG

TEST PIT STRATIGRAPHY LOG

Page ____ of ____

Project Name:	Contractor:	Test Pit Designation:
Project Number:		Date Started:
Client:	Surface Elevation:	Date Completed:
Location:	Test Pit Method:	CRA Supervisor:

Completed by: _____ Date: _____

CRA